

1 BRADLEY D. BLAKELEY (SBN 189756)

2 E-Mail: bblakeley@blakeleyllp.com

3 DAVID M. MANNION (SBN 288627)

4 E-Mail: dmannon@blakeleyllp.com

5 BLAKELEY & BLAKELEY LLP

6 2 Park Plaza, Suite 400

7 Irvine, California 92614

8 Telephone: (949) 260-0611

9 Facsimile: (949) 260-0613

10 Attorneys for Plaintiff,

11 EXPORT DEVELOPMENT CANADA

12 UNITED STATES DISTRICT COURT

13 CENTRAL DISTRICT OF CALIFORNIA

14 EASTERN DIVISION

15 EXPORT DEVELOPMENT
16 CANADA,

17 Plaintiff,

18 v.

19 CMV ELECTRIC, INC.

20 Defendant.

) Case No.: 5:14-cv-00174-JAK-SH

)

) Assigned to Hon. John A. Kronstadt

)

) **DECLARATION OF DAVID**

) **MANNION IN SUPPORT OF**

) **MOTION FOR DEFAULT**

) **JUDGMENT**

)

) Judge: Hon. John A. Kronstadt

) Date: April 21, 2014

) Time: 8:30 a.m.

) Place: 750 – 7th Floor

) 255 East Temple Street

) Los Angeles, CA 90012

)

1 I, David M. Mannion, hereby declare as follows:

2 1. I am an attorney licensed to practice law in the States of California and
3 New York and I am associated with the law firm of Blakeley & Blakeley LLP, located
4 at 2 Park Plaza, Irvine, California 92614, counsel to EDC¹ in the above-captioned
5 action. I am duly admitted to practice law before this Court. Except where expressly
6 stated, I have knowledge of the facts set forth herein, and if called as a witness to
7 testify thereto, could do so competently under oath. I respectfully submit this
8 Declaration in support of EDC's motion for default judgment against CMV.

9 2. As of March 20, 2014, CMV is liable to EDC for \$239,731.86, which
10 includes, among other items: (1) attorneys' fees in the amount of \$7,166.17, calculated
11 pursuant to Rule 55-3 of the Local Civil Rules for the United States District Court for
12 the Central District of California; and (2) costs and expenses of \$511.97 for the filing
13 and service of the complaint. *See*, Appendix, Exh. 3.

14 3. To date, CMV has failed to answer or otherwise respond to the
15 complaint.

16 4. Attached as Exhibit 1 to the accompanying Appendix is a true and correct
17 copy of EDC's complaint against CMV. All highlighting on the accompanying
18 exhibits has been added by the undersigned for ease of reference.

19

20 _____
21 ¹ All capitalized terms not otherwise defined herein shall have the same meaning as
22 assigned to them in the accompanying Memorandum of Points and Authorities.

